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OFFICE OF AUDITOR OF STATE

STATE OF IOWA

Mary Mosiman, CPA Auditor of State

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NEWS RELEASE

FOR RELEASE ______ February 1, 2016 515/281-5834

Auditor of State Mary Mosiman today released a report on the Iowa Department of Human Services for the year ended June 30, 2014.

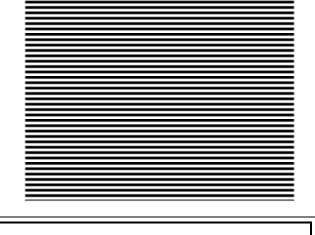
The Iowa Department of Human Services provides many types of assistance to Iowans in need. The Department also is responsible for the mental health institutions, hospital/schools and juvenile institutions.

The report contains recommendations for the Department to:

- (1) Comply with established guidelines related to various programs, such as the Supplemental Nutrition Assistance Program, Temporary Assistance for Needy Families (TANF) and Foster Care.
- (2) Comply with provisions of the Department's Employees' Manual applicable to the Residential Care Supplement.
- (3) Improve controls in the field offices.

The report also includes the Department's responses to the recommendations.

A copy of the report is available for review at the Iowa Department of Human Services, in the Office of Auditor of State and on the Auditor of State's web site at http://auditor.iowa.gov/reports/1560-4010-BR00.pdf.

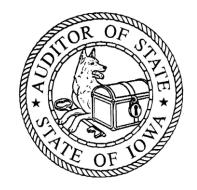


REPORT OF RECOMMENDATIONS TO THE IOWA DEPARTMENT OF HUMAN SERVICES

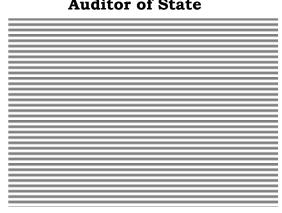
JUNE 30, 2014

AUDITOR OF STATE

State Capitol Building • Des Moines, Iowa



Mary Mosiman, CPA Auditor of State







STATE OF IOWA

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October 30, 2015

To the Council Members of the Iowa Department of Human Services:

The Iowa Department of Human Services is a part of the State of Iowa and, as such, has been included in our audits of the State's Comprehensive Annual Financial Report (CAFR) and the State's Single Audit Report for the year ended June 30, 2014.

In conducting our audits, we became aware of certain aspects concerning the Department's operations for which we believe corrective action is necessary. As a result, we have developed recommendations which are reported on the following pages. We believe you should be aware of these recommendations, which include those reported in the State's Single Audit Report and the State's Report on Internal Control, as well as other recommendations pertaining to the Department's internal control and compliance with statutory requirements and other matters. These recommendations have been discussed with Department personnel and their responses to these recommendations are included in this report. While we have expressed our conclusions on the Department's responses, we did not audit the Iowa Department of Human Services' responses and, accordingly, we express no opinion on them.

This report, a public record by law, is intended solely for the information and use of the officials and employees of the Iowa Department of Human Services, citizens of the State of Iowa and other parties to whom the Iowa Department of Human Services may report. This report is not intended to be and should not be used by anyone other than these specified parties.

We would like to acknowledge the many courtesies and assistance extended to us by personnel of the Iowa Department of Human Services during the course of our audits. Should you have questions concerning any of the above matters, we shall be pleased to discuss them with you at your convenience. Individuals who participated in our audits of the Department are listed on page 16 and they are available to discuss these matters with you.

ARY MOSIMAN, CPA Auditor of State WARREN G/JENKINS, CPA Chief Deputy Auditor of State

cc: Honorable Terry E. Branstad, Governor David Roederer, Director, Department of Management Glen P. Dickinson, Director, Legislative Services Agency

Findings Reported in the State's Single Audit Report:

CFDA Number: 10.551 - Supplemental Nutrition Assistance Program

Agency Number: 008016199S6008

Federal Award Year: 2014

State of Iowa Single Audit Report Comment: 14-III-USDA-401-1

(1) <u>Supplemental Nutrition Assistance Program (SNAP) Overpayment</u> – In response to the economic downturn, the federal government provided a temporary expansion of SNAP benefits, which expired November 1, 2013. As a result of the expiration of the temporary expansion, the Department recalculated the SNAP benefits and, on October 4, 2013, sent a notice of decision informing beneficiaries about the change in their SNAP benefits. However, due to a system error, the recalculation of benefits did not include approximately 21,000 households. The Department recalculated benefits for the excluded households and sent a notice of decision, on November 1, 2013, to households who had a change in benefits. The reduction in benefits ranged from \$11 per month for a household of one to \$65 per month for a household of eight.

SNAP benefits of \$51,249 for 4,481 households were provided to recipients in excess of the maximum monthly benefit. Since federal funds are not requested until benefits are redeemed, the actual overpayment is not known at this time.

<u>Recommendation</u> – The Department should determine the actual SNAP benefits used in excess of the maximum allowable amount and repay the federal government for any benefits overpaid.

<u>Response and Corrective Action Planned</u> – The Department made the decision not to file claims based on the administrative burden of pursuing the collection of between \$1 and \$89 for each of the food assistance cases in question.

The Department has reviewed the cases included in the system issue and calculated the amount of overpayment for each case. The Department is currently in the process of determining if any of the cases in question have already had benefits recouped. Upon final determination of the overpayment amount, the Department will work with the federal Food and Nutrition Service (FNS) to determine the most appropriate way to handle the system issues and the method of returning the overpayments to FNS.

CFDA Number: 93.558 - Temporary Assistance for Needy Families

Agency Number: 1302IATANF, 1402IATANF

Federal Award Year: 2013, 2014

State of Iowa Single Audit Report Comment: 14-III-HHS-401-1

(2) Computer Match - Family Investment Program (FIP) - The Department operates FIP utilizing federal funds provided for in the Temporary Assistance for Needy Families (TANF) block grant. Title 4-C-39 of the Employees' Manual provides, in part, "A participant whose needs are included in a FIP grant cannot receive at the same time a grant from any other public assistance program administered by the Department, including foster care and subsidized adoption." Title 17-F-14 of the Employees' Manual provides, in part, "A child shall not concurrently receive subsidized adoption maintenance payments and FIP."

The Department allows a participant to receive both FIP and foster care or FIP and subsidized adoption for the month the child is removed from the home to enter foster care or for the month the child begins receiving subsidized adoption payments.

Although Title 4-C-39 of the Employees' Manual states a participant cannot receive both FIP and foster care assistance at the same time, a letter dated February 14, 2014 from the Administration for Children and Families stated, "Federal TANF regulations allow for concurrent TANF and Title IV-E benefits only if the situation involves a Foster Care placement with a relative. If the placement is with a non-relative, concurrent payment of benefits is only allowable in limited circumstances." A computer match of payment data was performed for cases receiving both FIP and foster care payments during fiscal year 2014. We reviewed 101 cases receiving both FIP and foster care payments during the same month of service. Of the 101 cases reviewed, 19 children, or 19%, received both FIP and foster care payments for an additional one to two months after entering foster care with a non-relative. Although these payments are not in compliance with the Employees' Manual, it is unclear if they meet the exception allowed by the federal government.

A computer match of payment data was performed for cases receiving both FIP and subsidized adoption payments during fiscal year 2014. We reviewed 109 cases receiving both FIP and subsidized adoption payments during the same month of service. Of the 109 cases reviewed, 15 cases, or 14%, improperly received both FIP and subsidized adoption payments for an additional one to twelve months after entering subsidized adoption. The unallowable FIP payments for these 15 cases totaled \$8,438.

<u>Recommendation</u> – The Department should review its policies and establish procedures which comply with federal regulations to identify concurrent FIP and foster care payments and concurrent FIP and subsidized adoption payments. The Department should review cases identified and determine if recoupment should be performed.

Response and Corrective Action Planned – The Department's policies and procedures have been reviewed and are in compliance with federal regulations. As indicated in the letter dated February 14, 2014, from the Administration for Children & Families (ACF), there are no federal Title IV-E regulations against concurrent Title IV-E and Family Investment Program (FIP – Iowa's TANF program) payments. The letter then goes on to clarify consistent with federal regulations and other guidance issued by ACF, when TANF funds can be used with respect to a child in foster care or who has been adopted. Specifically, the letter clarifies the following:

- 1) TANF cannot be used to replace IV-E foster care maintenance payments. Iowa does not use TANF funding for foster care or adoption maintenance. FIP, foster care and adoption are all distinct programs having their own funding streams and payment mechanisms. While concurrent payments may occur, funding and payment methods continue to be distinct for each program.
- 2) TANF can be used for foster care activities "previously authorized" under the state's former Aid to Families with Dependent Children (AFDC) State Plan prior to TANF. All of Iowa's TANF expenditures meet one or more of the four TANF purposes or are transferred to Child Care or Social Services Block Grant (SSBG). Therefore Iowa does not use the "previously authorized" provision as the basis for using TANF funding for foster care activities.
- 3) TANF can only be used for assistance for children in their own home or the home of relatives unless the child meets one of the exceptions, including if the child is removed from the home for a temporary absence. For Iowa, this is the only federal TANF restriction applicable to situations when a child receiving FIP is placed in foster care or is adopted. ACF has indicated that the Department's policy of allowing concurrent payments of FIP and foster care (or adoption) for the month the child enters foster care or is adopted or the month the child returns home, is reasonable. The only remaining issue then is whether after the month a child leaves the FIP home, the absence is temporary. The Department continues to work with staff to document when the child is removed from the home and placed into foster care or an adoption setting, whether the absence is considered temporary pursuant to federal TANF regulations and Departmental policy.

The Department has also worked with field workers on cases not determined to be temporary removals to minimize the concurrent payments and have established procedures to set up a recoupment when a case has an incorrect payment. A centralized recoupment unit was established to process all recoupments when identified. Since SFY12, errors have decreased from 28 percent to 19 percent. All recoupments for the above noted cases have been sent to the centralized unit and recoupments have been established.

Training will be updated and presented to front line eligibility staff and their supervisors in April 2015. In instances where the change occurs during or after the system "cut-off" time and the worker is unable to take immediate action, an automated email will be sent to the worker to notify the worker of the potential for overpayment. If the payment does occur and is not within policy or is not appropriate, the overpayment recoupment request is and will be sent to a centralized unit for timely processing.

CFDA Number: 93.558 - Temporary Assistance for Needy Families

Agency Number: G-1302IATANF, G-1402IATANF

Federal Award Year: 2013, 2014

State of Iowa Single Audit Report Comment: 14-III-HHS-401-6

(3) Eligibility Tracking System/Iowa Issuance Verification System Eligibility – The Code of Federal Regulations, 45 CFR 264.1(a) and Title 4-C-108 of the Employees' Manual imposes a 60 month lifetime limit on the period families with adults can receive Temporary Assistance for Needy Families (TANF) funded assistance. The TANF program provides federal funding for the Family Investment Program (FIP) program. The Department uses the Iowa Automated Benefits Calculation System (IABC) to track eligibility for individuals and to issue payments. The Iowa Issuance Verification System (ISSV) then tracks the payments issued by IABC. The Eligibility Tracking System (ETS) tracks the number of months in which the family has received FIP payments based on information from the ISSV and the IABC systems. When the 60 month limit is reached, a Department employee must manually close the case in IABC to cancel FIP payments.

For three of 29 cases reviewed, the number of benefit months per ETS does not agree with the number of months in which ISSV issued payments.

<u>Recommendation</u> – The Department should ensure the number of benefit months per ETS are correctly recorded.

<u>Response and Corrective Action Planned</u> – Individual cases in error were reviewed by the appropriate Income Maintenance Administrator. Each case in error was also reviewed by a supervisor with the individual worker whose action or inaction resulted in the error.

Training was drafted and approved by policy staff related to the 60 month limit. The training will be available to the field workers on March 19, 2015 as part of the income maintenance monthly conference webinar.

Conclusion – Response accepted.

Findings Reported in the State's Report on Internal Control:

- (1) Financial Reporting Departments record receipts and disbursements in the Integrated Information for Iowa (I/3) system throughout the year, including the accrual period. Activity not recorded in the I/3 system is reported to the Iowa Department of Administrative Services State Accounting Enterprise (DAS-SAE) in a GAAP package. The GAAP package is to be submitted to DAS-SAE by the first week of September each year. The following were noted:
 - (a) Commitments due to outside contractors were understated by \$36,524,669. This was properly adjusted for reporting purposes.
 - (b) Drug rebate receivables were understated by \$11,780,783. Accounts payable due to the Federal government were also understated by \$11,780,783. The understatement of the accounts receivable and accounts payable did not have an effect on the net position of the State. This was properly adjusted for reporting purposes.

<u>Recommendation</u> – The Department should ensure the information reported in the GAAP package is complete and accurate.

Response -

- (a) The Iowa Department of Administrative Services provides the report of commitments from the I/3 system to the Department of Human Services. The report provided contains instances where a single contract is listed multiple times with differing values. For those items listed multiple times, the incorrect value was reported on the Department's GAAP package. The Department of Human Services continues to work with the Department of Administrative Services to receive a report of commitments from the I/3 system which is free from duplication. The Department has also revised procedures for how to report commitments when a contract appears on the report in multiple instances. Upon notification of the error, the Department reviewed all instances of duplication to ensure the appropriate contract amount was reported.
- (b) The Department of Human Services began a new program as a result of the Affordable Care Act. Drug rebate information from the Iowa Health and Wellness Program, which began January 1, 2014, was missed when determining the amount owed from drug rebate labelers and the subsequent federal share owed to Centers for Medicaid and Medicare Services (CMS) upon collection. The information was corrected upon notification and the procedures were revised to ensure inclusion of the additional drug rebate amounts in future years.

Other Findings Related to Internal Control:

(1) Residential Care Facilities (RCF) Case Files – The residential care supplement is a State Supplementary Assistance (SSA) program. A Residential Care Facility (RCF) is a facility which provides support to individuals who do not require the services of a registered nurse. To receive SSA payments, a person must be living in a licensed RCF and the facility must have a contract with the Department to participate in the program using form 470-0443, Application and Contract Agreement for Residential Care Facilities. Title 6-B-81 of the Employees' Manual provides eligibility factors must be reviewed annually for all recipients who do not receive a Supplemental Security Income (SSI) payment. As part of this review, recipients must complete form 470-3118, Medicaid Review.

For all of twenty-six case files reviewed, form 470-0443 was not utilized by the Department. For two of twenty-six case files reviewed, the file did not include form 470-3118.

<u>Recommendation</u> – The Department should establish procedures to ensure compliance with the Employees' Manual.

<u>Response</u> – Form 470-0443 "Application and Contract Agreement for Residential Care Facilities" is duplicative of the Iowa Medicaid Enterprise (IME) Provider Agreement which is signed during enrollment. Due to the oversight, the Provider Services Unit of the IME mailed a letter to all active RCF's requesting form 470-0443 be completed and returned. Policy staff will modify the Provider Manual to show form 470-0443 must be submitted upon enrollment of each provider as well as during the mandatory re-enrollment process which occurs every five years.

Form 470-3118 "Medicaid Review" should be completed annually. The two errors noted were isolated to one service delivery area. The errors were reviewed by the Income Maintenance Administrator and the Income Maintenance Supervisor. Information was sent to all supervisors in the service delivery area to share with workers. No additional action is planned.

<u>Conclusion</u> – Response accepted.

(2) Foster Care (Title IV-E) – The Title IV-E program provides assistance payments for maintenance, adoption assistance and voluntary foster care. Iowa Administrative Code 441-130.7(3) states, "A case plan that meets the requirements of Iowa Code section 232.2 shall be filed within 60 days from the date the child enters foster care or the date the Department opens a child welfare service case, whichever occurs first." Of thirty two cases reviewed, three case plans were not developed within 60 days.

<u>Recommendation</u> – The Department should establish procedures to ensure compliance with the Iowa Administrative Code.

<u>Response</u> – The errors noted were reviewed and addressed by the Social Work Administrators, the respective supervisor and discussed with the worker at the local level to ensure future compliance with IAC 441-130.7(3).

Conclusion - Response accepted.

- (3) <u>DHS Field Office Internal Controls</u> For fiscal year 2014, five county offices and eight Child Support Recovery Unit (CSRU) offices were visited. In conjunction with this limited review, the following conditions were noted:
 - (a) In three county offices and two CSRU offices, the person who opens the mail and receives the checks does not write the receipt.
 - (b) In one CSRU office, receipt duties are not properly segregated.
 - (c) In four CSRU offices, the date a receipt was received from the Collection Service Center could not be determined. As a result, it could not be determined if the receipt was received from the Collection Service Center within thirty days as required by Title 23-B-5 of the Employees' Manual.
 - (d) In one county office and three CSRU offices, receipts were not filled out in their entirety per the Collections Manual. Items which were not filled out included client name, explanation or description and program.
 - (e) In one county office and one CSRU office, a receipt tracking log was not maintained or the receipt was not included in the receipt log.
 - (f) In one county office, it could not be determined if the manual receipt was applied to the proper state ID.
 - (g) In one county office, proper support for special issuance disbursements was not maintained.

<u>Recommendation</u> - The Department should implement changes to strengthen internal controls.

<u>Response</u> – The child support recovery unit offices have adopted an electronic log for the tracking of payments and the receipt process replacing the paper documents. Many of the findings noted are reflective of a paper process that is no longer used in the child support recovery offices. The use of the log and its content was reviewed with the onsite auditor. Future audits should take into consideration the use of the electronic logs used for tracking receipts at child support recovery unit offices.

For county offices, each error was reviewed with the local staff at the time of audit. Error lists and requests for review and response were sent to the Business Manager for respective locations. Each error was also reviewed by management. The individual worker(s) and offices received additional guidance and reminders on processes.

Specific corrective action plans for each individual finding are as follows:

- (a) At the three county offices in error, the findings were addressed at the specific offices found to be in error. In addition, the findings have been shared with each supervisor who manages the support staff at all full-time offices that receive mail. The Business Manager has also sent a reminder to supervisors and support staff to correct the errors.
 - At CSRU offices, the individual opening the mail may not be authorized to write official state receipts, however, a compensating control has been implemented. The CSRU uses an electronic log to track payments received. The individual opening the mail enters the payment information into the electronic receipt log along with his or her worker ID. This electronic log is verified by an independent worker and checked by the Collection Service Center with incoming receipts. No corrective action is planned as sufficient compensating controls are in place.

- (b) Receipt duties are segregated as follows: When a CSRU worker receives a check in the mail, the worker enters the check on the electronic log with his or her worker ID. At the end of each day, an independent CSRU worker verifies each check is entered on the electronic log and properly accounted for. The independent worker also enters his or her worker ID next to each payment on the spreadsheet. The checks are sent to the Collections Service Center (CSC) for processing. Once received, a CSC worker enters the date the payment was processed on the same electronic log. Additional information regarding the error noted at the child support recovery office will be requested to determine corrective action needed to maintain compliance with the established procedure.
- (c) CSRU offices have been reminded to write the date a payment was received by CSC on the receipts to ensure the 30-day timeframe has been met. However, the date the CSC received the payment is noted on the electronic tracking log or in ICAR. CSC monitors the electronic tracking log for timely submission of payments mailed to the CSRU. In the event a payment is not received by the CSC, an electronic notification is also generated by the ICAR system and follow up correspondence is initiated by the CSC.
- (d) Staff in both the county offices and CSRU offices have been reminded of the need for all items to be properly completed.
- (e) Staff in both the county offices and CSRU offices have been reminded to ensure a receipt is written every time it is appropriate to do so and to enter receipts on the approved tracking system.
- (f) The receipt process was reviewed with the employee who issued the receipt noted in error to ensure future receipts contain the necessary information to document funds were returned on a specific client ID.
- (g) The procedures for special issuances were addressed with the office supervisor and support staff responsible for maintaining payment records.

<u>Conclusion</u> – Response accepted.

(4) <u>DHS Field Office – Case Records – For fiscal year 2014</u>, five county offices were visited. In three county offices, required visits to children in out-of-home placement were not completed at least once every calendar month in accordance with Chapter 441.202.11(2) of the Iowa Administrative Code for three of twelve foster care cases reviewed.

<u>Recommendation</u> – The Department should establish procedures to ensure compliance with the Iowa Administrative Code.

Response – The audit errors were reviewed at the time of the audit with supervisors and staff in all three counties cited in error. Additional monitoring is planned to assure visits are completed timely. The Bureau Chief for the social work help desk and training was also notified of the audit errors. The Bureau Chief shared the information about missed visits with all social work administrators on August 10, 2015 for local follow up as appropriate.

Conclusion - Response accepted.

- (5) Eligibility Sixty Month Limitation There is a sixty month limitation on Family Investment Program (FIP) benefits unless a hardship exemption is approved. Title 4-C-72 of the Employees' Manual provides, in part, the individual must complete form 470-3826, Request for FIP Beyond 60 Months. Form 470-3876, Hardship Exemption Determination, is then completed to document the final hardship exemption determination. Form 470-3876 should be approved or denied within thirty days of receipt of form 470-3826. All documents should be included in the individual's case file.
 - (a) For one of twenty-five cases reviewed, the Income Maintenance worker did not make the hardship exemption determination within thirty days.
 - (b) For three of twenty-five cases reviewed, the Income Maintenance worker did not complete form 470-3876, Hardship Exemption Determination.
 - (c) For three of twenty-five cases reviewed, the Income Maintenance worker did not input the correct starting day to determine eligibility for a hardship exemption.
 - (d) For two of twenty-five cases reviewed, the Income Maintenance worker did not receive documentation to support the reason for the hardship exemption request.
 - (e) For one of twenty-five cases reviewed, the individual did not sign form 470-3826, Request for FIP Beyond 60 Months, and form 470-3876, Hardship Exemption Determination, was not signed by the Promise Jobs worker or the Income Maintenance worker.
 - (f) For one of twenty-five cases reviewed, the Income Maintenance worker did not sign form 470-3876, Hardship Exemption Determination, and the Income Maintenance worker did not issue a "Notice of Decision". Therefore, the effective date of the hardship exemption determination could not be determined.
 - (g) For one of twenty-five cases reviewed, there was no hardship exemption request. However, FIP benefits were not cancelled after sixty months. The case was not cancelled for eight months.
 - (h) For two of twenty-five cases reviewed, the case was issued a time extension to obtain information about the hardship exemption request. However, evidence of the extension was not documented.
 - <u>Recommendation</u> The Department should implement procedures to ensure compliance with the Employees' Manual and documentation in case files is complete.
 - <u>Response</u> For each case cited above, the errors were reviewed by the Income Maintenance Administrator, the respective supervisor and discussed with the worker at the local level. To prevent future errors, the policies and procedures related to the determinations were covered by IM trainers in a statewide staff call on March 19, 2015.

Specific corrective action plans for each individual finding are as follows:

(a) All documentation must be received for staff to make a proper determination of hardship. A report of incapacity was missing from the original submission of documentation and was not received until the 26th day after application. Staff completed the determination as soon as all paperwork and partners were able to complete their portion of the process.

- (b) Supervisors reviewed the specific errors noted and corrective action was completed. For two of the cases in error, the missing documentation was completed and uploaded to the appropriate casefile. For the third case in error, a recoupment was completed.
- (c) Supervisors reviewed the errors and met with workers to correct each error as necessary.
- (d) Supervisors reviewed the errors and met with workers to correct each error as necessary. The missing documentation was obtained and placed in the case files. Each case noted in error was an appropriate hardship case.
- (e) DHS and Iowa Workforce Development (IWD) jointly process cases when there are Promise Jobs (PJ) related requirements for eligibility since the PJ program oversight and eligibility is managed at IWD while the FIP case is within DHS responsibility. In this instance, both the PJ worker and the DHS worker received notice on the case, but neither obtained the individual's signature. The DHS Income Maintenance Administrator confirmed the client was eligible for the Promise Jobs program and followed up with the appropriate staff in an effort to avoid future errors.
- (f) The case noted in error was between hardship periods and was appropriately determined hardship eligible. The worker failed to document the dates of the new hardship and issue notice for the most recent period. The supervisor discussed the error with worker and the case has been corrected.
- (g) The supervisor discussed the error with the worker and a recoupment has been completed.
- (h) The supervisor met with the workers and discussed the importance of documenting the evidence of the extension in the case files.

Conclusion – Response accepted.

- (6) <u>Intermediate Care Facility Intellectual Disabilities (ICF-ID)</u> Placement in an Intermediate Care Facility is an optional Medicaid benefit for persons with intellectual disabilities or other related conditions.
 - Title 6-Appendix of the Employees' Manual states, in part, form 470-0374, "Resident Care Agreement," is to be completed by a worker at the county office of the Department when a resident is approved for Medicaid payment. For one of 10 case files reviewed, the case file did not contain form 470-0374.
 - <u>Recommendation</u> The Department should establish procedures to ensure compliance with the Employees' Manual.
 - <u>Response</u> The ICF/ID case responsibility was moved to a centralized unit in 2010. Errors have dropped from 32 in 2010 to 1 in 2014, documenting an improvement in the process. This single error was reviewed by the supervisor and discussed with the worker. No additional action is planned.

(7) Eligibility – Infant Social Security Number – Title 4-C-148 of the Employees' Manual provides a FIP participant who is the mother of a newborn child has until the last day of the month following the month she was released from the hospital to apply for a newborn's social security number. Proof of application for the infant's social security number must be in the case record no later than the last day of the month following the month the mother is released from the hospital in order to avoid a payment error.

For three of forty-four cases reviewed, the infant's social security number was not requested by the case worker until 2 months to a year after the birth of the infant.

<u>Recommendation</u> – Employees should request the infant's social security number so the social security number is available in the required time frame. If the mother does not comply, the Department should follow up within a reasonable time frame.

<u>Response</u> – The process to request a newborn social security number relies on communication between the centralized unit and the local office. In this instance, the request was not made by the local office. The centralized unit supervisor and the local office supervisor were informed of the error and discussed the issue with the appropriate staff. The error was also reviewed at the local level during the exit interview with the auditors on-site.

Conclusion - Response accepted.

(8) Eligibility – IV-A Application – Title 14-Appendix-14 of the Employees' Manual provides form 470-0615, Application for All Social Services, is to be used to collect information needed to determine eligibility for social services and IV-A funded emergency assistance services and to record the Department's determination of IV-A eligibility. The application must be signed by the applicant and the Department worker certifying approval of eligibility.

For two of twenty-nine cases reviewed, the case file did not include form 470-0615, Application for All Social Services

<u>Recommendation</u> – The Department should establish procedures to ensure compliance with the Employees' Manual.

<u>Response</u> – Both errors noted were isolated to one service delivery area. The Service Area Manager of the delivery area was notified of the error and affirmed the application was not completed. The Social Work Administrator and respective supervisors reviewed the cases and discussed the error and appropriate procedures with staff. Supervisory oversight was put in place to prevent future errors.

Findings Related to Statutory Requirements and Other Matters:

<u>Iowa Code Compliance</u> – Chapter 217.40 of the Code of Iowa requires the Department, or a person designated by the Director, to establish training programs designed to assist all duly appointed guardians and conservators in understanding their fiduciary duties and liabilities, the special needs of the ward and how to best serve the ward and the ward's interests.

The Department eliminated the training coordinator position due to budget constraints.

<u>Recommendation</u> – The Department should take steps to ensure compliance with the Code of Iowa or the Department should seek the repeal of the Code section.

<u>Response</u> – The Department requested in SSB 1182 that the training requirement of chapter 217.40 of the Code of Iowa be eliminated. The section of the bill that contained the request was struck and therefore the revision was not included in the final legislation, SF 482. The Department will continue to work with the Code Editor to identify necessary Code changes and where necessary, propose and/or support legislation which more accurately reflects the current structure.

Staff:

Questions or requests for further assistance should be directed to:

Michelle B. Meyer, CPA, Manager Keith C. Kistenmacher, Senior Auditor II Jennifer L. Wall, CPA, Senior Auditor II Andrew E. Nielsen, CPA, Deputy Auditor of State

Other individuals who participated in the audits include:

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